

**UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

No. 21-3032

UNITED STATES OF AMERICA,

Appellee,

v.

THEODORE DOUGLAS,

Appellant.

**APPELLEE'S UNOPPOSED MOTION FOR EXTENSION OF
TIME WITHIN WHICH TO FILE APPELLEE'S BRIEF**

Pursuant to D.C. Cir. R. 27(h), appellee, the United States of America, respectfully moves this Court for a 45-day extension of time, to and including July 11, 2022, within which to file its brief in this case. Appellee's brief is currently due on May 25, 2022. Appellee contacted counsel for appellant, Tony Axam, Jr., Esq., who indicated that he does not oppose this request. This is appellee's first request for an extension of time in this case.

As grounds for this motion, appellee states that the undersigned Assistant United States Attorney, to whom this matter is now assigned, will be unable to complete the government's brief by the current due date

because of the press of other appellate business, previously scheduled leave, and the need to review appellant's claims and the appellate record.

Respectfully submitted,

MATTHEW M. GRAVES
United States Attorney

CHRISELLA R. KOLB
Assistant United States Attorney

/s/

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CERTIFICATE OF COMPLIANCE WITH RULE 27(d)

I HEREBY CERTIFY pursuant to Fed. R. App. P. 32(g) that this motion contains 148 words, and therefore complies with the type-volume limitation of Fed. R. App. P. 27(d)(2)(A). This motion has been prepared in 14-point Century Schoolbook, a proportionally spaced typeface.

/s/

ERIC HANSFORD
Assistant United States Attorney

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have caused a copy of the foregoing motion to be served by electronic means, through the Court's CM/ECF system, upon counsel for appellant, Tony Axam, Jr., Esq., on this 29th day of April, 2022.

/s/

ERIC HANSFORD
Assistant United States Attorney